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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FEB 26 2014

David J. Bradley, Clerk of Court

UNSEALED
PER ARREST

14-0088

Criminal No.

(under seal)

UNITED STATES OF AMERICA §

V.

AHMAD MANZOR,

[REDACTED]

INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times material herein:

COUNT ONE

CONSPIRACY TO TRANSPORT STOLEN MERCHANDISE
IN INTERSTATE COMMERCE, 18 U.S.C. SECTION 371

The Grand Jury for the Southern District of Texas charges that:

A. INTRODUCTION

1. A. “booster” is a person who steals goods and merchandise, specifically, but not limited to over-the-counter medications (OTC) and dry infant formula from retail stores. OTC is medicine that does not require a prescription and includes non-prescription personal hygiene products that

can be readily sold in a secondary market. OTC includes but is not limited to Prilosec, Zantac, Claritin, and Mucinex. A “booster” often re-sells the stolen merchandise to a “fence”. “Boosters” also steal dry infant formula from stores and then sell to “fences.”

2. A “fence” is a person who receives stolen goods and merchandise from “boosters” and others in order to re-sell it for profit. The “fence” re-sells the stolen goods and merchandise to third parties, many times at a price lower than the manufacture charges.

3. [REDACTED] is the owner and Registered Agent of Payless Wholesale and Discount Wholesale LLC., registered address of Houston, Texas and whose warehouse is located in Houston, Texas. [REDACTED] was born in Lebanon and is a Legal Permanent Resident of the United States. [REDACTED] is a “fence” in the Houston area that receives stolen merchandise, including OTC and infant formula from “boosters.”

4. AHMAD MANZOOR is the owner of M&Z Candy, a business located in Bayonne, New Jersey and buys stolen baby formula from [REDACTED]

5. [REDACTED] is a Mexican National who is illegally in the United States. [REDACTED] organized “booster” crews to

steal infant formulas from Wal-Marts, HEB, Krogers, Winn Dixie and others.

[REDACTED] would then sell the stolen infant formulas to "fences."

B. THE CONSPIRACY AND ITS OBJECTS

Beginning on or about April 10, 2012, through the date of the of this indictment, in the Houston Division of the Southern District and elsewhere, the defendants,

AHMAD MANZOOR,
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

did knowingly, combine, conspire, confederate and agree, with each other with others known and unknown to the Grand Jury to commit the following offenses against the United States that is:

- (a) transport and cause to be transported in interstate commerce stolen goods, wares, and merchandise having a value of \$ 5,000 or more knowing that the goods, wares, and merchandise have been stolen, in violation of Title 18, United States Code, Section 2314.

C. MANNER AND MEANS

1. It was part of the plan and purpose of the conspiracy that one or more of the conspirators would buy stolen merchandise from traveling booster crews, usually consisting of undocumented aliens

from Mexico, Central and South America. These booster crews steal the OTC and infant formula from pharmacies and retail stores, sometimes by concealing the items in aluminum foil lined bags in order to evade detection from the stores' security.

2. It was further part of the plan and purpose of the conspiracy that [REDACTED] and others would knowingly buy stolen merchandise so that they could profit from their sale of stolen merchandise. [REDACTED] and others would pay [REDACTED] whose booster crew originally stole the merchandise in cash to aid in concealing the nature of this criminal enterprise.
3. It was a further part of the plan and purpose of the conspiracy that once the stolen infant formula was received by [REDACTED] and others in Houston, the conspirators would remove or caused to be removed the retailers' security labels and stickers to disguise the true origin of the infant formulas making it easier to sell and more profitable for the business.
4. It was a further part of the plan and purpose of the conspiracy that once the stolen merchandise was received at his warehouse, [REDACTED] and others directed employees to sort and repackage the stolen infant formula to prepare it for shipment to the out-of-

state wholesalers via "RL Freight," "UPS Freight" and other interstate carriers.

5. It was further part of the plan and purpose of the conspiracy that MANZOOR, purchased the stolen infant formula and wire transferred payment into accounts controlled by [REDACTED] and others.

D. OVERT ACTS

In furtherance of the conspiracy described herein, one or more of the co-conspirators committed one or more of the following acts by causing, on or about the below-listed dates, the following shipments of stolen infant formulas valued over \$5,000 to be shipped from Houston, Texas, to M&Z Candy in New Jersey:

Date	Shipping Company	Description
4/10/2012	RL	2 pallets of dry infant food
4/24/2012	RL	3 pallets of dry food
5/8/2012	RL	3 dry food
5/22/2012	RL	4 pallets of dry food
5/29/2012	RL	3 pallets of dry food
6/11/2012	RL	2 dry food pallet
6/18/2012	RL	2 skids dry food for kids
6/24/2012	RL	2 skids dry food for kids
7/9/2012	RL	3 skids dry food for kids
7/12/2012	RL	2 skids dry food
9/4/2012	RL	2 skids dry food for kids
9/20/2012	RL	3 skids of dry food for kids

10/22/2012	RL	2 skids of dry infant food
10/31/2012	UPS	3 pallets of dry food
11/9/2012	UPS	2 pallets
12/5/2012	UPS	4 pallets
1/16/2013	UPS	4 pallets
2/6/2013	UPS	5 pallets of dry formula

NOTICE OF FORFEITURE
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

A. Pursuant to 28 U.S.C. § 2461(c), and 18 U.S.C. § 981(a)(1)(C),
the United States gives the defendants,

AHMAD MANZOOR,






notice that in the event of conviction of the any of the offenses charged in
Count 1 of this Indictment (conspiracy to transport stolen merchandise in
interstate commerce, in violation of 18 U.S.C. §371) the United States
intends to seek forfeiture of all property, real or personal, which constitutes
or is derived from proceeds traceable to such offenses.

MONEY JUDGMENT

B. Defendants are notified that upon conviction, a money judgment
may be imposed equal to the total value of the property subject to
forfeiture.

SUBSTITUTE ASSETS

C. In the event that the property subject to forfeiture, as a result of any act or omission of a defendant:

- a. cannot be located upon the exercise of due diligence;
- b. had been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the total value of such property pursuant to 21 U.S.C. § 853 (p), as incorporated by 28 U.S.C. § 2461(c).

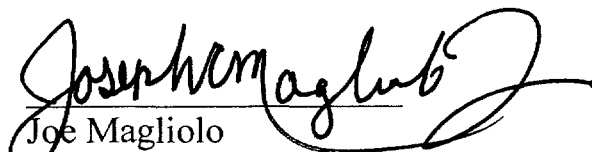
A TRUE BILL:

Original Signature on File

~~FOREPERSON OF THE GRAND JURY~~

KENNETH MAGIDSON
United States Attorney

By:


Joe Magliolo
Assistant United States Attorney